

PARISI & HAVENS LLP  
David C. Parisi (SBN 162248)  
Suzanne Havens Beckman (SBN 188814)  
212 Marine Street, Suite 100  
Santa Monica, CA 90405  
Telephone: (818) 990-1299  
Facsimile: (818) 501-7852  
dparisi@parisihavens.com  
shavens@parisihavens.com

*Attorneys for Plaintiffs Lynn Slovin, Samuel Katz,  
Jeffery Price, Justin Birkhofer on their own behalf,  
and on behalf of all others similarly situated*

KELLEY DRYE & WARREN LLP  
Lauri A. Mazzuchetti (*pro hac vice granted*)  
Edward J. Mullins III (*pro hac vice granted*)  
One Jefferson Road, 2<sup>nd</sup> Floor  
Parsippany, New Jersey 07054  
Telephone: (973) 503-5900  
Facsimile: (973) 503-5950  
lmazzuchetti@kelleydrye.com  
emullins@kelleydrye.com

*Attorneys for Defendants Sunrun Inc. Inc. and Clean  
Energy Experts, LLC*

[other counsel in signature block]

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA, OAKLAND**

LYNN SLOVIN, an individual, on her own  
behalf and on behalf of all others similarly  
situated,

Plaintiff,

v.

SUNRUN, INC., a California corporation,  
CLEAN ENERGY EXPERTS, LLC, a  
California limited liability company doing  
business as SOLAR AMERICA, and DOES 1  
through 5, inclusive,

Defendants.

Case No. 4:15-cv-05340-YGR

(Hon. Yvonne Gonzalez Rogers)

**STIPULATION TO CONTINUE DATES**

TAC Filed: July 12, 2016  
Trial Date: None Set

**STIPULATION TO CONTINUE DATES**

1 Plaintiffs Lynn Slovin, Samuel Katz, Jeffrey Price, and Justin Birkhofer (“Plaintiffs”) and  
2 Defendants Sunrun Inc. and Clean Energy Experts, LLC (“Defendants”) (collectively, the  
3 “Parties”), by and through their respective counsel, hereby stipulate as follows:

4 WHEREAS the Case Management Conference was held in this matter on November 14,  
5 2016 and a Case Management and Pretrial Order issued setting deadlines for the motion for class  
6 certification; the exchange of expert reports; and a settlement conference (Dkt. No. 70);

7 WHEREAS the Court scheduled a settlement conference with Magistrate Judge Maria-  
8 Elena James for February 14, 2017 and an ADR compliance deadline of February 24, 2017 (Dkt.  
9 No. 71);

10 WHEREAS, at the end of January 2017, Defendants produced their call detail records;

11 WHEREAS Plaintiffs sought to postpone the February 14, 2017 settlement conference to  
12 obtain additional time for Plaintiffs’ expert to analyze these call detail records and Defendants  
13 agreed not to oppose any postponement;

14 WHEREAS when Plaintiffs sought to postpone the settlement conference to March 2017,  
15 the Honorable Maria-Elena James had no availability until May 2017 and the Deputy Clerk to the  
16 Honorable James vacated the February 14, 2017 settlement conference (Dkt. No. 82);

17 WHEREAS the parties sought to proceed with ADR prior to May 2017 and have secured a  
18 private mediation with Hon. Edward Infante (Ret.) scheduled for March 7, 2017;

19 WHEREAS the parties have diligently engaged in discovery, including having taken  
20 multiple depositions in February 2017 and have additional depositions scheduled for the end of  
21 February 2017 and in March 2017;

22 WHEREAS the parties believe that they will engage in additional discovery through  
23 Spring of 2017 and that a short continuance of the current deadlines in this matter is warranted and  
24 will increase the likelihood that any future settlement conference will be successful;

25 IT IS HEREBY STIPULATED AND AGREED that, subject to Court approval, the current  
26 deadlines set in this matter be vacated and re-set as follows:  
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28

Event	Original Deadline	Requested Deadline
Settlement Conference Completion Date	February 14, 2017	March 7, 2017 (Scheduled date with Hon. J. Infante)
ADR Compliance Filing	February 24, 2017	March 14, 2017
ADR Compliance Hearing	March 3, 2017 at 9:01 a.m.	TBD
Plaintiff Expert Report Due	March 31, 2017	May 26, 2017
Defendant Expert Report Due	May 1, 2017	June 26, 2017
Rebuttal Expert Reports	May 22, 2017	July 17, 2017
Deadline to File Class Certification Motion	July 3, 2017	August 28, 2017
Class Certification Hearing	August 8, 2017	October 3, 2017 or such other date convenient with the Court

DATED: February 24, 2017

PARISI & HAVENS LLP

David C. Parisi  
Suzanne Havens Beckman

PARASMO LIEBERMAN LAW

Yitzchak H. Lieberman

By: /s/ David C. Parisi

David C. Parisi  
Attorneys for Plaintiffs

DATED: February 24, 2017

KELLEY DRYE & WARREN LLP

Lauri A. Mazzuchetti  
Edward Mullins  
Lee S. Brenner  
Catherine D. Lee

By: /s/ Lauri A. Mazzuchetti

Lauri A. Mazzuchetti  
Attorneys for Defendants Sunrun Inc. and  
Clean Energy Experts, LLC

1 Pursuant to Local Rule 5-4.3.4(a)(2)(i), I attest that all other signatories listed, and on  
2 whose behalf the filing is submitted, concur in the filing of this stipulation and have authorized the  
3 filing of this stipulation.

4  
5 DATED: February 24, 2017

PARISI & HAVENS LLP

David C. Parisi

Suzanne Havens Beckman

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8 PARASMO LIEBERMAN LAW

Yitzchak H. Lieberman

9 By: /s/ David C. Parisi

10 David C. Parisi

11 Attorneys for Plaintiffs  
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